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August 15, 2023

VIA ECF

The Honorable Paul A. Crotty
Senior United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Staling Dotel-Sena*
23 Cr. 101 (PAC)**

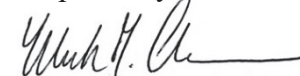
Dear Judge Crotty:

Please recall that I represent Mr. Staling Dotel-Sena in the above-referenced matter. Mr. Dotel-Sena is presently scheduled for sentencing before Your Honor on September 6, 2023, at 12:00 p.m. For the reasons that follow I write to respectfully request a 30-day adjournment of the sentencing hearing. I have discussed this request with A.U.S.A. Patrick Moroney, and the Government has no objection. This is the defense's first sentencing adjournment request.

Unfortunately, I am unable to appear before Your Honor on September 6, 2023, as I have previously scheduled travel plans and will be out of the country from August 24, 2023 through September 6, 2023. Additionally, the parties have scheduled a safety valve proffer session for August 22, 2023, and would like to complete the proffer prior to submitting our respective sentencing memoranda, gathering materials in aid of sentencing, and preparing Mr. Dotel-Sena for his hearing before Your Honor.

Therefore, I respectfully request a 30-day adjournment of the sentencing hearing to early October 2023, or a date convenient to the Court thereafter. I further respectfully request that the due dates for the parties' respective sentencing submissions be adjusted to correspond with Mr. Dotel-Sena's anticipated new sentencing date and in accordance with Your Honor's rules. Thank you for your consideration.

Respectfully submitted,



Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Patrick R. Moroney (via email)

8/17/2023

The September 6 sentencing is adjourned to October 11, 2023 at noon. Sentencing submissions are due by October 5. SO ORDERED. 